

## REMARKS

### CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 1-7, 9, 16, 17, 19, 25-27, 29 and 30 are rejected under 35 U.S.C. §103(a) as being obvious in view U.S. Patent No. 6,253,243 issued to Spencer (*Spencer*) and further in view of U.S. Patent No. 6,425,006 issued to Chari et al. (*Chari*). Claims 29 and 30 have been canceled. Therefore, the rejection of these claims is moot. Applicant respectfully submits that claims 1-7, 9, 16, 17, 19, and 25-27 are not obvious in view of *Spencer* and further in view of *Chari* for at least the reasons described below.

### Independent Claims 1, 16, 25, and 27

Claim 1 recites, in part, the following:

detecting alert events on a client using a platform independent agent integrated with said client;  
...sending command data to the remote alert proxy in response to the detected alert events;  
...translating the command data into specific client-based hardware control data to automatically perform hardware control operations on the client.

Claims 16, 25, and 27 recite similar limitations.

The Office action cites *Spencer* and *Chari* as teaching the limitations of claim 1. Applicant submits that neither *Spencer* nor *Chari* disclose sending command data to the remote alert proxy in response to the detected alert events and translating the command data into specific client-based hardware control data to automatically perform hardware control operations on the client. The cited portions of *Spencer* discuss that SNMP traps are converted into event notifications. See column 8, lines 1-3, column 9, lines 4-7, and column 19, lines 36-41. Event notifications indicate that a particular managed resource

associated with an agent has experienced a fault or failure condition. See column 2, lines 18-27. Event notifications **notify** a management information system and/or its operator of faults or failure conditions. Event notifications **do not** perform hardware control operations on a client to remedy faults or failure conditions. Thus, *Spencer* fails to teach or disclose the above-cited limitations of claim 1.

The abstract of *Chari* states that when an alert occurs, the invention displays the particular computer's name, a description of the alert, the time and date of the alert, and details about a recommended course of action. *Chari* is silent regarding any further action beyond recommending a course of action. In other words, like *Spencer*, *Chari* does not teach or disclose sending command data to the remote alert proxy in response to the detected alert events and translating the command data into specific client-based hardware control data to automatically perform hardware control operations on the client. Thus, *Chari* fails to cure the deficiencies of *Spencer*. Therefore, Applicant respectfully submits claims 1, 16, and 25 are not obvious in view of *Spencer* and further in view of *Chari*.

Claims 2-7 and 9 depend from claim 1. Claims 17 and 19 depend from claim 16. Claim 26 depends from claim 25. Given that dependent claims necessarily include the limitations of the claims from which they depend, Applicant respectfully submits that claims 2-7, 9, 17, 19, and 25 are not obvious in view of *Spencer* and further in view of *Chari*.

Dependent Claims 8, 18 and 28

Claims 8, 18 and 28 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Spencer* in view of *Chari* and further in view of U.S. Patent No. 5,689,708 issued to

Regnier et al. (*Regnier*). Applicant respectfully submits that claims 8, 18 and 28 are not obvious in view of *Spencer*, *Chari*, and *Regnier* for at least the reasons set forth below.

As discussed above, *Spencer* and *Chari* fail to teach or disclose at least one limitation from each of the independent claims. *Regnier* was cited as teaching additional limitations from dependent claims 8, 18 and 28 including referencing a plain text “ini” file. Whether or not *Regnier* actually teaches this limitation, *Regnier* does not teach or disclose translating reported alert events to client specific hardware control data as claimed by Applicant in claims 1, 16, and 27. Therefore, *Regnier* fails to cure the deficiencies of *Spencer* and *Chari*. Claim 8 depends from claim 1. Claim 18 depends from claim 16. Claim 28 depends from claim 27. Thus, Applicant submits that claims 8, 18, and 28 are not obvious in view of *Spencer*, *Chari*, and *Regnier*.

#### CONCLUSION

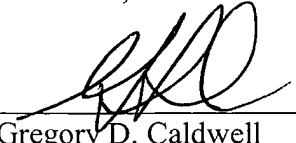
In view of the remarks set forth above, Applicant submits that claims 1-9, 16-19, and 25-28 are in condition for allowance and such action is respectfully solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account  
number 02-2666.

Respectfully submitted,  
**BLAKELY, SOKOLOFF, TAYLOR &  
ZAFMAN, LLP**

Date: \_\_\_\_\_

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Gregory D. Caldwell  
Reg. No. 39,926

12400 Wilshire Boulevard, Seventh Floor  
Los Angeles, CA 90025-1026  
(503) 439-8778